

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**CERTIFICATION OF COUNSEL REGARDING APPROVAL OF JOINT
STIPULATION REGARDING CLAIMS OF ORACLE AMERICA, INC.**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, and Oracle America, Inc. (“Oracle” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation and hereby certify as follows:

1. Oracle is a licensor of computer software and pursuant to agreements, provides software-related products, technical support, maintenance, educational materials, and programs, as well as cloud-based and point of sale services, which Oracle often customizes for the customer’s specific needs.

2. Prior to January 15, 2025 (the “Petition Date”), Jo-Ann Stores, LLC and Oracle were parties to several such license agreements (the “Oracle Agreements”). The Oracle Agreements were rejected effective May 31, 2025.

3. On April 4, 2025, pursuant to the *Notice of Deadlines for the Filing of Proofs of Claim, Including Pursuant to Section 503(b)(9) of the Bankruptcy Code*, Oracle timely filed a claim in the total amount of \$339,733.53 designated as Claim No. 10877, which included an

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

administrative claim in the amount of \$245,877.95 (the “Initial Administrative Request”) and a general unsecured claim of \$93,855.58.²

4. In addition, on or about August 8, 2025, Oracle filed its *Oracle America, Inc.’s Request for Allowance and Payment of Chapter 11 Administrative Expenses* [Docket No. 1545] (the “Administrative Expense Motion”). Between the Initial Administrative Request and the unpaid portion of the Administrative Expense Motion, Oracle was asserting a total administrative priority amount of \$454,417.47.

5. The Plan Administrator asserts that Debtors have paid a portion of the administrative expenses due and owing to Oracle and that the remaining administrative expense claim is \$356,170.01, leaving a variance of \$98,247.46.

6. Plan Administrator and Oracle hereby agree to resolve the administrative claims set forth in Claim No. 10877 and the Administrative Expense Motion by payment of \$356,170.01 to Oracle, with the remaining variance of \$98,247.46 being added to the general unsecured portion of Oracle’s Claim No. 10877, for a total revised general unsecured claim of \$192,103.04 (\$93,855.58 + \$98,247.46).

7. Within five (5) business days of the entry of the Consent Order, Oracle agrees to withdraw the Administrative Expense Motion with prejudice. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order that is consistent with this Stipulation.

8. For the avoidance of doubt, the general unsecured portion of Claim No. 10877 shall remain on the Claims Register with a general unsecured claim of \$192,103.04, subject to the GUC Trust’s further objection on any substantive or non-substantive grounds.

² On or about August 14, 2025, Oracle filed a general unsecured proof of claim designated as Claim No. 19846 in the amount \$1,038,005.9. This Stipulation does not address Claim No. 19846.

9. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the “Proposed Order”).

10. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

11. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

Dated: January 9, 2026
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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- and -

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